

REMARKS

Claims 41, 47 and 48 have been amended.

The Examiner has rejected applicant's claims 41, 43 and 47-50 under 35 U.S.C. §103(a) as being unpatentable over the Pfeiffer, et al. patent (U.S. Patent No. 5,146,592) in view of the Hamada, et al. patent (U.S. Patent No. 5,826,035). With respect to applicant's claims, as amended, this rejection is respectfully traversed.

Applicant's independent claims 41 and 47 have been amended to better define applicant's invention. More particularly, applicant's independent claim 41 has now been amended to recite an arbitration unit adapted to assign a higher priority to a process of accessing from the image capture unit to the memory than a process of refreshing the memory, and to assign a higher priority to a process of refreshing the memory than a process of accessing from the image compression unit to the memory. Applicant's independent claim 47 has been similarly amended.

The Examiner has argued that the Pfeiffer, et al. patent teaches an "image capture unit (10) to capture an image data [and] . . . storing means for storing image data." The Examiner has also argued that the Pfeiffer, et al. patent also teaches that "an arbitration circuit is provided to determine the priority of various requests to access memory [and] . . . that the screen refresh function of the video DRAM shift registers is given top priority (which is viewed as the process for storing image data), followed by refresh of the DRAM cells, and then address the request from the image algorithm processor."

However, it is noted that the "screen refresh function of the video DRAM shift registers" described by the Examiner performs functions in conjunction with the video image computer 22 and not in conjunction with the video image transducer 10 which the Examiner has equated to the image capture unit. As seen in FIG. 1 of the Pfeiffer, et al. patent, a digitizer and mass data

storage unit 18 separates the video image computer 22 from the transducer 10. Moreover, from the discussion of FIG. 2 of the Pfeiffer, et al patent it is evident that the video image computer 22 and a disk controller 32 are connected to a common bus 34, that the disk controller 34 is connected to the magnetic tape medium 42 and the disk medium 44, and that "image data recorded on the tape or disk mediums 42 and 44 respectively is the result of the digitizing of an image by a video camera or other memory transducer."

Accordingly, the operation of the screen refresh function of the video image computer 22, which is described in detail from column 21, line 40, to column 22, line 13, of the Pfeiffer, et al. patent, is not believed to cause accessing from an image capture unit to a memory. Applicant's amended claims 41 and 47, and their respective dependent claims, in reciting an arbitration unit adapted to assign a higher priority to a process of accessing from the image capture unit to the memory than a process of refreshing the memory, and to assign a higher priority to a process of refreshing the memory than a process of accessing from the image compression unit to the memory" thus patentably distinguish over the Pfeiffer, et al. patent.

The Hamada, et al. patent fails to add anything to the Pfeiffer, et al. patent to change this conclusion. Applicant's amended claims thus patentably distinguish over the combination of the Pfeiffer, et al. and Hamada, et al. patents.


In view of the above, it is submitted that applicant's claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is

respectfully requested.

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Respectfully submitted,


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